## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

JESSICA BERRYHILL, on behalf of herself and all other similarly-	) CASE NO. 5:19-cv-02504-JRA
situated individuals,	) JUDGE JOHN R. ADAMS
Plaintiff,	) MAGISTRATE JUDGE ) HENDERSON
V.	)
<b>B&amp;I HOTEL MANAGEMENT, LLC,</b>	)
Defendant.	)

## JOINT MOTION FOR APPROVAL OF COURT-AUTHORIZED NOTICE

Pursuant to this Court's September 14, 2021 Order (ECF No. 14), the parties jointly submit EXHIBIT 1 as their proposed Notice informing Potential Opt-Ins of the pendency of this collective action and permitting them to opt into the case as opt-in party plaintiffs. The parties propose that Defendant produce a class roster within 14 days of the Court's approval of the proposed Notice and that Plaintiff has 14 days from receipt of the roster to effectuate mailing. Accordingly, the parties respectfully request the Court approve their jointly proposed Notice.

/s/ Joshua B. Fuchs
Joshua B. Fuchs (0087066)
josh@fuchsfirm.com
THE FUCHS FIRM LLC
14717 South Woodland Road
Shaker Heights, Ohio 44120
(216) 505-7500 (Telephone/Facsimile)

s/ James J. Hux
James J. Hux (0092992)
HUX LAW FIRM, LLC
3 Severance Circle #18147

Cleveland Heights, Ohio 44118

Phone: (937) 315-1106 Fax: (216) 359-7760

Email: jhux@huxlawfirm.com

Counsel for Plaintiff

## WALTER | HAVERFIELD LLP

/s/ Joseph J. Brennan Mark S. Fusco (0040604)

Joseph J. Brennan (0085353) The Tower at Erieview 1301 E. Ninth Street, Suite 3500 Cleveland, OH 44114-1821 (216) 781-1212 (216) 575-0911 (Fax)

mfusco@walterhav.com jbrennan@alterhav.com

Counsel for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of September, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties who have made an appearance by operation of the Court's electronic filing system and those parties may access the filing through the Court's system.

/s/ Joshua B. Fuchs